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10 Attorneys for Party-in-Interest Erika Girardi

11 **UNITED STATES BANKRUPTCY COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

13 In re

14 GIRARDI KEESE,

15 Debtor.

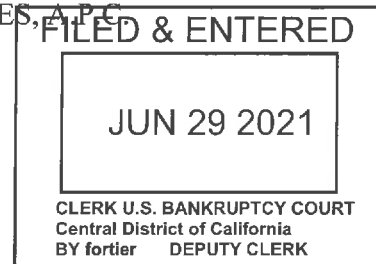
Case No. 2:20-bk-21022-BR

Chapter 7

**STIPULATION AND ORDER TO EXTEND
BRIEFING SCHEDULE ON MOTION FOR
RECONSIDERATION OF ORDER
GRANTING CHAPTER 7 TRUSTEE'S
APPLICATION TO EMPLOY THE LAW
OFFICES OF RONALD RICHARDS &
ASSOCIATES, A.P.C. AS SPECIAL
LITIGATION COUNSEL**

[Related to ECF Nos. 437 and 438]

Judge: Hon. Barry Russell



1 This *Stipulation to Extend Briefing Schedule on Motion for Reconsideration of Order*
2 *Granting Chapter 7 Trustee's Application to Employ the Law Offices of Ronald Richards &*
3 *Associates, A.P.C. as Special Litigation Counsel* (the "Stipulation") is entered into by and between
4 Elissa D. Miller, chapter 7 trustee ("Trustee") for bankruptcy debtor Girardi Keese, and party-in-
5 interest Erika Girardi ("Ms. Girardi"), by and through their attorneys of record herein, based on
6 the following facts:

7 A. On June 24, 2021, Ms. Girardi filed her *Notice of Motion and Motion for*
8 *Reconsideration of Order Granting Chapter 7 Trustee's Application to Employ the Law Offices of*
9 *Ronald Richards & Associates, A.P.C. as Special Litigation Counsel* [Dkt. 437] (the "Motion");
10 and

11 B. On June 25, 2021, this Court issued its *Order on "Notice of Motion and Motion for*
12 *Reconsideration of Order Granting Chapter 7 Trustee's Application to Employ the Law Offices of*
13 *Ronald Richards & Associates, A.P.C. as Special Litigation Counsel"* [Dkt. 438], ordering any
14 opposition to the Motion be filed on or before 4:00 p.m. on Friday, July 2, 2021, and any reply to
15 any opposition be filed on or before 4:00 p.m. on Friday, July 9, 2021.

16 NOW, THEREFORE, following discussions between counsel, the Trustee and Ms. Girardi
17 stipulate and agree to entry of an order extending the current briefing schedule for 14 days, as
18 follows:

19 1. The deadline for any opposition to the Motion shall be extended from Friday, July
20 2, 2021, to on or before 4:00 p.m. on Friday, July 16, 2021;

21 2. The deadline for any reply to any opposition to the Motion shall be extended from
22 Friday, July 9, 2021, to on or before 4:00 p.m. on Friday, July 23, 2021;

23 3. No further pleadings will be allowed; and

24 4. The Court will determine whether to set the matter for hearing after reviewing any
25 opposition and/or reply.

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Respectfully submitted,

DATED: June __, 2021

LAW OFFICES OF RONALD RICHARDS &
ASSOCIATES, A.P.C.

By: _____

Ronald N. Richards
Special Litigation Counsel to
Elissa D. Miller, Chapter 7 Trustee

DATED: June 28, 2021

GREENBERG GROSS LLP

By: _____

Evan C. Borges
Attorneys for Party-in-Interest Erika Girardi

Respectfully submitted,

DATED: June 28, 2021

LAW OFFICES OF RONALD RICHARDS &
ASSOCIATES, A.P.C.

By: 

Ronald N. Richards
Special Litigation Counsel to
Elissa D. Miller, Chapter 7 Trustee

DATED: June 28, 2021

GREENBERG GROSS LLP

By: 

Evan C. Borges
Attorneys for Party-in-Interest Erika Girardi

ORDER

Based on the foregoing Stipulation of the parties, IT IS HEREBY ORDERED THAT:

1. The deadline for any opposition to the Motion shall be extended from Friday, July 2, 2021, to on or before 4:00 p.m. on Friday, July 16, 2021;
2. The deadline for any reply to any opposition to the Motion shall be extended from Friday, July 9, 2021, to on or before 4:00 p.m. on Friday, July 23, 2021;
3. No further pleadings will be allowed; and
4. The Court will determine whether to set the matter for hearing after reviewing any opposition and/or reply.

IT IS SO ORDERED.

Date: June 29, 2021



Barry Russell
United States Bankruptcy Judge